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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CHRISTINA REYNA QUINTANA,  
ANGELA MARIE JASPER, AMBER  
YOUNG, ROCHELLE MONIQUE  
WOOD, JAMES ANTHONY SCHWARZ,  
ELROY DANIEL BOUCHARD,  
KHAMTHENE THONGDY, COLLEEN  
MCDANIEL, TAMBERLYN SOLOMON,  
and LOIS JEAN FRANK,

Defendants.

No. 3:23-cr-00091-SLG-KFR

COUNT 1:  
CONTINUING CRIMINAL  
ENTERPRISE  
Vio. of 21 U.S.C. § 848(a) and (b)

COUNT 2:  
CONSPIRACY TO DISTRIBUTE AND  
POSSESS WITH INTENT TO  
DISTRIBUTE CONTROLLED  
SUBSTANCES  
Vio. of 21 U.S.C. §§ 846 and  
841(a)(1), (b)(1)(A), (B), and (C)

COUNTS 3, 4, AND 11:  
POSSESSION OF A CONTROLLED  
SUBSTANCE WITH INTENT TO  
DISTRIBUTE  
Vio. of 21 U.S.C. § 841(a)(1),  
(b)(1)(C)

COUNT 5:  
DISTRIBUTION OF A CONTROLLED  
SUBSTANCE

Vio. of 21 U.S.C. § 841(a)(1),  
(b)(1)(C)

COUNTS 6, 7, 8, 9, 10, 12, AND 13:  
ATTEMPTED POSSESSION OF A  
CONTROLLED SUBSTANCE WITH  
INTENT TO DISTRIBUTE

Vio. of 21 U.S.C. § 841(a)(1),  
(b)(1)(C)

COUNT 14:  
MONEY LAUNDERING  
CONSPIRACY

Vio. of 18 U.S.C. § 1956(h)

COUNTS 15 AND 16:  
FELON IN POSSESSION OF  
FIREARM

Vio. of 18 U.S.C. §§ 922(g)(1) and  
924(a)(8)

ENHANCED STATUTORY  
PENALTIES ALLEGATION:  
21 U.S.C. § 841(b)

## INDICTMENT

The Grand Jury charges that:

COUNT 1

Beginning not later than about February 2022, the exact date being unknown to the Grand Jury, and continuously thereafter up through and including July 5, 2023, within the District of Alaska and elsewhere, the defendant, CHRISTINA REYNA QUINTANA, unlawfully, knowingly, and intentionally engaged in a Continuing Criminal Enterprise, in

that she unlawfully, knowingly and intentionally violated Title 21, United States Code, §§ 841, 843, 846, 848, and 952, which violations and others, including but not limited to, the offenses charged in Counts 2-13 of this Indictment, were part of a continuing series of felony violations of Subchapters I and II of the Controlled Substances Act, Title 21, United States Code, Sections 801, *et seq.*, undertaken by the defendant in concert with at least five other persons with respect to whom she occupied a position of organizer, a supervisory position, and a position of management, and from which such continuing series of violations the defendant obtained substantial income and resources.

Furthermore, the defendant, CHRISTINA REYNA QUINTANA, was a principal administrator, organizer, supervisor, and leader of the criminal enterprise, and the offense involved at least 1 kilogram of pure methamphetamine, and at least 12 kilograms of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl) described in 21 U.S.C. § 841(b)(1)(B).

All of which is in violation of 21 U.S.C. § 848(a) and (b).

## COUNT 2

Beginning on a precise date unknown to the Grand Jury, but no later than February 2022, and continuing to July 5, 2023, within the District of Alaska and elsewhere, the defendants, CHRISTINA REYNA QUINTANA, ANGELA MARIE JASPER, AMBER YOUNG, ROCHELLE MONIQUE WOOD, JAMES ANTHONY SCHWARZ, ELROY DANIEL BOUCHARD, KHAMTHENE THONGDY, COLLEEN McDANIEL, TAMBERLYN SOLOMON, LOIS JEAN FRANK, and others both known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and

agree with one another and with others both known and unknown to the Grand Jury to distribute and possess with the intent to distribute controlled substances, to wit: 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, and 400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), and cocaine.

All in violation of 21 U.S.C. §§ 846 and 841(a)(1), (b)(1)(A), (B), and (C) as to CHRISTINA REYNA QUINTANA and 21 U.S.C. §§ 846 and 841(a), (b)(1)(C) as to ANGELA MARIE JASPER, AMBER YOUNG, ROCHELLE MONIQUE WOOD, JAMES ANTHONY SCHWARZ, ELROY DANIEL BOUCHARD, KHAMTHENE THONGDY, COLLEEN MCDANIEL, TAMBERLYN SOLOMON, LOIS JEAN FRANK.

COUNT 3

On or about September 11, 2022, within the District of Alaska, the defendant, KHAMTHENE THONGDY, did knowingly and intentionally possess with intent to distribute methamphetamine.

All of which is in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

COUNT 4

On or about September 21, 2022, within the District of Alaska, the defendant, ELROY DANIEL BOUCHARD, did knowingly and intentionally possess with intent to distribute methamphetamine.

All of which is in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

COUNT 5

On or about January 24, 2023, within the District of Alaska, the defendant, JAMES ANTHONY SCHWARZ, did knowingly and intentionally distribute N-phenyl-N-[1-(2-phenylethyl )-4-piperidinyl] propanamide (fentanyl).

All of which is in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

COUNT 6

Beginning on or about February 16, 2023, and continuing until on or about February 22, 2023, within the District of Alaska, the defendant, ROCHELLE MONIQUE WOOD, did knowingly and intentionally attempt to possess with intent to distribute N-phenyl-N-[1-(2-phenylethyl )-4-piperidinyl] propanamide (fentanyl).

All of which is in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

COUNT 7

Beginning on or about February 17, 2023, and continuing until on or about February 22, 2023, within the District of Alaska, the defendant, ROCHELLE MONIQUE WOOD, did knowingly and intentionally attempt to possess with intent to distribute N-phenyl-N-[1-(2-phenylethyl )-4-piperidinyl] propanamide (fentanyl).

All of which is in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

COUNT 8

Beginning on or about February 17, 2023, and continuing until on or about February 22, 2023, within the District of Alaska, the defendant, ROCHELLE MONIQUE WOOD, did knowingly and intentionally attempt to possess with intent to distribute N-phenyl-N-[1-(2-phenylethyl )-4-piperidinyl] propanamide (fentanyl).

All of which is in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

COUNT 9

Beginning on or about February 16, 2023, and continuing until on or about March 9, 2023, within the District of Alaska, the defendant, COLLEEN MCDANIEL, did knowingly and intentionally attempt to possess with intent to distribute N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl).

All of which is in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

COUNT 10

Beginning on or about February 16, 2023, and continuing until on or about February 21, 2023, within the District of Alaska, the defendants, LOIS JEAN FRANK and TAMBERLYN SOLOMON, did knowingly and intentionally attempt to possess with intent to distribute N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl).

All of which is in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

COUNT 11

On or about February 21, 2023, within the District of Alaska, the defendant, TAMBERLYN SOLOMON, did knowingly and intentionally possess with intent to distribute N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl).

All of which is in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

COUNT 12

Beginning on or about February 17, 2023, and continuing until on or about February 20, 2023, within the District of Alaska, the defendant, TAMBERLYN SOLOMON, did knowingly and intentionally attempt to possess with intent to distribute N-phenyl-N-[1-(2-

phenylethyl )-4-piperidiny] propenamide (fentanyl).

All of which is in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

COUNT 13

Beginning on or about February 17, 2023, and continuing until on or about March 2, 2023, within the District of Alaska, the defendant, LOIS JEAN FRANK, did knowingly and intentionally attempt to possess with intent to distribute a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl )-4-piperidiny] propenamide (fentanyl).

All of which is in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

COUNT 14

Beginning on or about a date unknown but by at least August 4, 2022 and continuing through July 15, 2023, within the District of Alaska and elsewhere, the defendants, ANGELA MARIE JASPER, ROCHELLE MONIQUE WOOD, JAMES ANTHONY SCHWARZ, ELROY DANIEL BOUCHARD, KHAMTHENE THONGDY, COLLEEN MCDANIEL, TAMBERLYN SOLOMON, and others both known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree with other persons known and unknown to the grand jury to commit offenses against the United States in violation of 18 U.S.C. § 1956, to wit:

- (a) to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of a specified unlawful activity, that is, the unlawful distribution of controlled substances in violation of 21 U.S.C. § 841(a)(1), with the intent to promote the

carrying on of the unlawful distribution of controlled substances, and that while conducting and attempting to conduct such financial transactions knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity in violation of 18 U.S.C. § 1956(a)(1)(A)(i); and

(b) to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, the unlawful distribution of a controlled substance in violation of 21 U.S.C. § 841(a)(1), knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity in violation of 18 U.S.C. § 1956(a)(1)(B)(i).

#### OVERT ACTS OF THE CONSPIRACY

In furtherance of the conspiracy and to effect and accomplish its objectives, and as evidence of the agreement, the defendants and others known and unknown to the Grand Jury committed the following acts, among others, in the District of Alaska and elsewhere:

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	<u>Defendants</u>	<u>Date</u>	<u>Financial Transaction</u>
a.	Elroy Daniel Bouchard	August 4, 2022	MoneyGram transfer of \$2,000.00 to an individual in Mexico
b.	Elroy Daniel Bouchard	August 4, 2022	RIA Financial transfer of \$2,000.00 to an individual in Mexico
c.	Angela Marie Jasper	September 17, 2022	Cash App transfer of \$2,000.00 to Amy Garcia
d.	Colleen McDaniel, Angela Marie Jasper	September 18, 2022	Cash App transfer of \$1,700.00 from McDaniel to Jasper
e.	Angela Marie Jasper, Elroy Daniel Bouchard	September 20, 2022	Cash App transfer of \$3,000.00 from Jasper to Bouchard
f.	Elroy Daniel Bouchard, Angela Marie Jasper	September 24, 2022	Cash App transfer of \$1,000.00 from Bouchard to Jasper
g.	Angela Marie Jasper	September 24, 2022	Attempted Cash App transfer of \$1,000.00 to Amy Garcia
h.	Elroy Daniel Bouchard	September 24, 2022	Cash App transfer of \$1,000.00 to Amy Garcia
i.	Elroy Daniel Bouchard	September 24, 2022	Attempted Cash App transfer of \$2,000.00 to Amy Garcia
j.	Rochelle Monique Wood	October 30, 2022	Western Union wire transfer of \$1,950.00 to an individual in Mexicali, Mexico
k.	Rochelle Monique Wood	November 3, 2022	Western Union wire transfer of \$1,950.00 to an individual in Mexicali, Mexico
l.	James Anthony Schwarz	November 3, 2022	Western Union wire transfer of \$1,950.00 to an individual in Mexicali, Mexico
m.	James Anthony Schwarz	November 3, 2022	Western Union wire transfer of \$1,950.00 to an individual in Mexicali, Mexico
n.	James Anthony Schwarz	November 3, 2022	Western Union wire transfer of \$1,950.00 to an individual in Mexicali, Mexico
o.	Rochelle Monique Wood	November 14, 2022	Western Union wire transfer of \$1,000.00 to an individual in Mesa, Arizona
p.	Rochelle Monique Wood	December 22, 2022	Western Union wire transfer of \$2,500.00 to an individual in Fullerton, California

q.	Rochelle Monique Wood	December 23, 2022	Western Union wire transfer of \$3,000.00 from an individual in Dillingham, Alaska
r.	Colleen McDaniel	December 31, 2022	Attempted Cash App transfer of \$2,000.00 to Amy Garcia
s.	James Anthony Schwarz	January 14, 2023	Western Union wire transfer of \$1,000.00 from an individual in Sand Point, Alaska
t.	James Anthony Schwarz	January 14, 2023	Western Union wire transfer of \$1,000.00 from an individual in Sand Point, Alaska
u.	James Anthony Schwarz	January 14, 2023	Western Union wire transfer of \$990.00 from an individual in Sand Point, Alaska
v.	James Anthony Schwarz	February 20, 2023	Western Union wire transfer of \$2,500.00 from an individual in Kodiak, Alaska
w.	James Anthony Schwarz	February 20, 2023	Western Union wire transfer of \$2,500.00 from an individual in Anchorage, AK
x.	James Anthony Schwarz	February 20, 2023	Western Union wire transfer of \$2,500.00 from an individual in Anchorage, AK
y.	James Anthony Schwarz	February 21, 2023	Cash App transfer of \$1,000.00 to Amy Garcia
z.	James Anthony Schwarz	February 21, 2023	Cash App transfer of \$1,000.00 to Amy Garcia
aa.	James Anthony Schwarz	February 21, 2023	Cash App transfer of \$2,000.00 to Amy Garcia
bb.	James Anthony Schwarz	February 24, 2023	Attempted Cash App transfer of \$1,500.00 to Amy Garcia
cc.	James Anthony Schwarz	February 28, 2023	Cash App transfer of \$500.00 to Amy Garcia
dd.	James Anthony Schwarz	February 28, 2023	Attempted Cash App transfer of \$500.00 to Amy Garcia
ee.	James Anthony Schwarz	February 28, 2023	Cash App transfer of \$500.00 to Amy Garcia
ff.	James Anthony Schwarz	February 28, 2023	Cash App transfer of \$500.00 to Amy Garcia
gg.	Elroy Daniel Bouchard	February 28, 2023	Cash App transfer of \$100.00 from an individual in Anchorage, AK

hh.	Tamberlyn Solomon	April 17, 2023	Western Union wire transfer of \$2,000.00 to an individual in Culiacán, Mexico
ii.	Tamberlyn Solomon	April 21, 2023	Western Union wire transfer of \$2,000.00 to an individual in Mexicali, Mexico
jj.	Colleen McDaniel	April 26, 2023	Cash App transfer of \$5,000.00 to Amy Garcia
kk.	James Anthony Schwarz	May 27, 2023	Western Union wire transfer of \$2,000.00 to an individual in Culiacán, Mexico
ll.	Khamthene Thongdy	July 15, 2023	Attempted Western Union wire transfer of \$2,000.00 to an individual in Culiacán, Mexico

All of which is in violation of 18 U.S.C. § 1956(h).

COUNT 15

On or about March 22, 2022, within the District of Alaska, the defendant, KHAMTHENE THONGDY, knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, to wit: a Glock 19 9mm semiautomatic pistol.

All of which is in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(8).

COUNT 16

On or about September 11, 2022, within the District of Alaska, the defendant, KHAMTHENE THONGDY, knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, firearms, to wit:

- a Glock 17 9mm semiautomatic pistol;
- a Glock 42 .380 ACP semiautomatic pistol; and

- a Glock 29 10mm semiautomatic pistol.

All of which is in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(8).

Prior Convictions – Khamthene Thongdy

<u>Conviction Date</u>	<u>Offense</u>	<u>Court</u>	<u>Case No.</u>
January 14, 2011	Misconduct Involving Controlled Substances in the Fourth Degree	Alaska Superior Court, Third Judicial District at Anchorage	3AN-10-12606CR
September 7, 2010	Misconduct Involving Controlled Substances in the Third Degree	Alaska Superior Court, Third Judicial District at Anchorage	3AN-10-07276CR

ENHANCED STATUTORY PENALTIES ALLEGATION

Before the defendant, CHRISTINA REYNA QUINTANA, committed the offenses charged in Counts 1 and 2 of this case, she had two final convictions for serious drug felonies, to wit:

- Possession of Controlled Substance with Intent to Sell, in the Superior Court of California, Orange County, case number 07WF2806, and
- Drug Conspiracy, in the United States District Court for the District of Alaska, case number 1:18-cr-00007-TMB,

for each of which she served a term of imprisonment of more than 12 months and for each of which her release from such term of imprisonment was within 15 years of the commencement of the offenses charged in Counts 1 and 2.

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All pursuant to 21 U.S.C. § 841(b).

A TRUE BILL.

s/ Grand Jury Foreperson  
GRAND JURY FOREPERSON

s/ Christopher D. Schroeder  
CHRISTOPHER D. SCHROEDER  
Assistant U.S. Attorney  
United States of America

s/ Kate Vogel for  
S. LANE TUCKER  
United States Attorney  
United States of America

DATE: October 17, 2023